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*COUNSEL FOR SETH KRETZER,
RECEIVER FOR GREAT VALUE STORAGE LLC
AND WORLD CLASS CAPITAL GROUP LLC*

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In Re:	§	Chapter 11
	§	
GVS TEXAS HOLDINGS I, LLC, <i>et al.</i> 1	§	Case No. 21-31121-MVL
	§	
Debtors	§	(Jointly Administered)
	§	

**SETH KRETZER’S, AS RECEIVER FOR GREAT VALUE STORAGE,
LLC AND WORLD CLASS CAPITAL GROUP LLC, MOTION FOR
SETTING AND REQUEST FOR EXPEDITED HEARING ON MOTION
FOR LEAVE TO FILE UNTIMELY CLAIM**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW SETH KRETZER, RECEIVER FOR GREAT VALUE STORAGE, LLC
AND WORLD CLASS CAPITAL GROUP LLC, an interested party and creditor, and files Seth
Kretzer’s, as Receiver for Great Value Storage, LLC and World Class Capital Group LLC, Motion
for Setting and Request for Expedited Hearing on Motion for Leave to File Untimely Claim
(“Motion to Expedite”) requesting that an expedited hearing be set on the Receiver’s Motion for
Leave to File Untimely Claim (“Motion for Leave”) [Doc. 749], and in support thereof would

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: GVS Texas Holdings I, LLC (7458); GVS Texas Holdings II, LLC (1225); GVS Portfolio I, LLC (6441); GVS Portfolio I B, LLC (7171); GVS Portfolio I C, LLC (3093); WC Mississippi Storage Portfolio I, LLC (0423); GVS Nevada Holdings I, LLC (4849); GVS Ohio Holdings I, LLC (6449); GVS Missouri Holdings I, LLC (5452); GVS New York Holdings I, LLC (5858); GVS Indiana Holdings I, LLC (3929); GVS Tennessee Holdings I, LLC (5909); GVS Ohio Holdings II, LLC (2376); GVS Illinois Holdings I, LLC (9944); and GVS Colorado Holdings I, LLC (0408). The location of the Debtors’ service address is: 814 Lavaca Street, Austin, Texas 78701.

show the Court as follows:

1. The Receiver was appointed pursuant to an Order Approving Receiver and Compelling Discovery (“Receivership Order”) entered on June 30, 2021 in the 165th District Court in Harris County, Texas, Cause No. 2019-18855 styled *Princeton Capital Corp. v. Great Value Storage LLC, World Class Capital Group LLC and Natin Paul*. As set forth in the Motion for Leave, the Receivership Order has been subject to various stays during the pendency of these bankruptcy cases. Accordingly, the Receiver has filed its Motion for Leave to File an Untimely Claim now that the Receivership Order is no longer subject to a stay.

2. Time is of the essence in considering the Motion for Leave because the Debtors have proposed a sale of substantially all assets (the “Sale”), as well as a plan of reorganization (the “Plan”) which proposes payment to all creditors. Hearings are set on March 16, 2022 at 9:30 a.m. to consider the Sale and Plan confirmation.

3. The Receiver believes that it would be advantageous to all parties if the Motion for Leave is heard on the same hearing date, and therefore requests the Court set the Motion for Leave on March 16, 2022 at 9:30 a.m. in accordance with the proposed order attached hereto as Exhibit 1.

4. The Receiver further reserves all rights, claims, defenses, and remedies, including without limitation, the right to amend, modify or supplement this Motion to Expedite.

5. Counsel for the Receiver has contacted Debtors’ counsel to discuss this request, as well as the request set forth in the Motion for Leave, but as of the date of this Motion to Expedite, has not received a response.

Dated: March 2, 2022

Respectfully submitted,

CULHANE MEADOWS PLLC

By: /s/ Lynnette R. Warman
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*COUNSEL FOR SETH KRETZER,
RECEIVER FOR GREAT VALUE STORAGE LLC
AND WORLD CLASS CAPITAL GROUP LLC*

Certificate of Service

I hereby certify that a true and correct copy of the foregoing pleading was served electronically through the Court's ECF system on March 2, 2022, on all parties registered for electronic service.

/s/ Lynnette R. Warman
Lynnette R. Warman

Certificate of Conference

I hereby certify that on March 2, 2022, the undersigned counsel contacted counsel for the Debtors to ask whether the Debtors would object to the Motion to Expedite. At the time of filing this pleading, the undersigned had not been advised by Debtors' counsel as to the Debtors' position on this matter.

/s/ Lynnette R. Warman
Lynnette R. Warman